

12:13 pm, Dec 22 2021

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF MARYLAND**

AT BALTIMORE
 CLERK, U.S. DISTRICT COURT
 DISTRICT OF MARYLAND
 BY _____ Deputy

IN THE MATTER OF A SEARCH OF:

**NINE U.S. POSTAL SERVICE PARCELS
 LOCATED AT THE INCOMING MAIL
 FACILITY IN LINTHICUM HEIGHTS,
 MD.**

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Case Number: 1:21-mj-3523 TMD

**AFFIDAVIT IN SUPPORT OF APPLICATION
 FOR A SEARCH WARRANT FOR ONE U.S. POSTAL SERVICE PARCEL**

Your Affiant, Miguel J. Bosch Jr, United States Postal Inspector, Linthicum Heights, MD, being duly sworn, hereby deposes and states as follows:

I. Subject Parcels.

1. This is an Affidavit submitted in support of an Application for a Search Warrant for nine (9) subject U.S. Mail Parcels, hereinafter "Subject Parcels." The Subject Parcels are currently located at the United States Postal Inspection Service ("USPIS") Incoming Mail Facility Domicile in Linthicum Heights, MD. The Subject Parcels are specifically identified as follows:

<i>Subject Parcel No.</i>	<i>Express (E) or Priority (P) and Tracking ID number</i>	<i>From: Name and Address</i>	<i>To: Name and Address</i>
1.	(E) EJ844256647US	Ceramics & Co 1225 Via Carolina RPV, CA 90275	Jamie Rosier 3442 Hickory Ave Baltimore, MD 21211
2.	(E) EJ517163315US	Lori Hanson 1150 Farmers Ln Santa Rosa, CA 95405	Untouchable Solutions LLC 12 Dunnett Ct Nottingham, MD 21236
3.	(E) EJ940031592US	Tim Hudson 1001 Medicine Way Ukiah, CA 95482	Dacora Ross 2639 Sarrington Cir Baltimore, MD 21244

4.	<i>(E) EI217893118US</i>	<i>Moyle 4179 48th Ave S St. Petersburg, FL 33711</i>	<i>Douglas Day 8572 Braebrooke Dr Lanham, MD 20706</i>
5.	<i>(E) EI126001023US</i>	<i>Ceramics & Co 1225 Via Carolina RPV, CA 90275</i>	<i>Sarah Moore 35 Tradewind Cir Cockeysville, MD 21030</i>
6.	<i>(E) EJ517163307US</i>	<i>Lori Hanson 1150 Farmers Ln Santa Rosa, CA 95405</i>	<i>Untouchable Solutions LLC 12 Dunnett Ct Nottingham, MD 21236</i>
7.	<i>(E) EI160371514US</i>	<i>Moses Espinosa 6926 Lindy Ave Reseda, CA 91335</i>	<i>Mya Fields 5516 Plainfield Ave Baltimore, MD 21206</i>
8.	<i>(E) EI160371491US</i>	<i>Moses Espinosa 14609 XXXX St #2 Van Nuys, CA 91405</i>	<i>Cody Mayfield 5945 Schering Rd Baltimore, MD 21206</i>
9.	<i>(E) EJ826632151US</i>	<i>Radu Constanta 2711 Batson Ave Rowland Heights, CA 91748</i>	<i>Ceausu Maria 3918 Claremont St Baltimore, MD 21224</i>

II. Affiant's Training and Experience

2. Your Affiant, Miguel Bosch Jr. has been a United States Postal Inspector since March 2019 and is a graduate of the Federal Law Enforcement Training Center ("FLETC") in Glynco, Georgia. Your affiant has received training in conducting criminal investigations of violations of the United States Code. I am presently assigned to the Contraband Interdiction and Investigations Team (CI2). Prior to my employment as a Postal Inspector with the United States Postal Inspection Service ("USPIS"), I was employed with the Coast Guard Investigative Service (CGIS), for the U.S. Department of Homeland Security as a Special Agent between 2008 and 2019. I began my

federal law enforcement career in 1998, when I entered on duty with the U.S. Border Patrol (USBP), of the U.S. Department of Justice, Immigration and Naturalization Service (INS). Additionally, I have accumulated over twenty three years of combined active duty and reserve time in the U.S. Coast Guard, where I served in several counter narcotics units. I have led, conducted, and/or participated in multiple criminal investigations of violations of Federal laws involving violent crimes, theft, and narcotic(s). As a result of your Affiant's training, your Affiant is aware that Priority Mail Express and Priority Mail services are regularly used by narcotic traffickers to ship controlled substances and bulk cash through the US Mail.

3. Based upon my training and experience in the field of narcotic interdiction through the mails, I know that there are suspicious characteristics common to many packages that contain narcotics, controlled substances or the proceeds thereof (i.e. U.S. currency). These factors, more fully detailed below, are used to identify packages requiring further investigation. In the case of this search warrant, several of these factors were identified, and the package was alerted to by a drug detection canine. The most common factors or suspicious characteristics routinely observed in the course of screening packages are as follows:

a. *Contrasts observed between legitimate business parcels and drug parcels:*

As an alternative to First Class Mail (which does not provide a customer with the capability to track the progress of a parcel through the system), the U.S. Postal Service offers Priority Mail Express and Priority Mail. Priority Mail Express is guaranteed (money back) to be delivered on a set date and time, usually overnight. (That deadline is determined at the time of mailing.) The customer receives a receipt with this guaranteed information, and the sender can opt for a signature requirement at the other end or not. Customers can track the parcel online by its distinct Priority Mail Express tracking number. The weight of the package and the distance traveled are the two

main factors in setting the price. Priority Mail Express costs more than Priority Mail. Priority Mail has a delivery service standard of 1-3 business days, but delivery within that time period is not guaranteed. Priority Mail is a less expensive alternative to Priority Mail Express, but still provides the ability to track a parcel. Legitimate businesses using Priority Mail Express typically have a business or corporate account visible on the mailing label, which covers the cost of the mailing. In contrast, the drug distributor will pay for the cost of mailing the package at the counter by using cash or a credit card. Business Priority Mail Express parcels typically weigh no more than 8 ounces, and business Priority Mail parcels typically weigh no more than 2 pounds. Drug packages typically exceed these weights. Address labels on business parcels are typically typed, whereas those on drug packages are typically handwritten. In your Affiant's experience, it is fairly easy to separate out smaller parcels, which constitute 70% to 80% of all Priority Mail Express and Priority Mail parcels, from other, heavier parcels. Typically, drug traffickers use Priority Mail Express, and will opt out of the requirement of obtaining a signature upon delivery.

b. *Invalid Sender/Return Address:* When drugs are shipped through the mail, the senders generally do not want them back. To distance themselves from parcels containing drugs, often the return addresses and the names of senders are fictitious or false. A fictitious or false address is anything from an incorrect zip code, to a non-existent house number or street. The name of the sender is also typically invalid in one of several ways. Your Affiant has seen packages sent by persons with names of celebrities, cartoon characters, or fictional names. More often a search of a law enforcement database reflects that there is no association between the name of the sender and the address provided.

c. *Invalid Recipient/Address:* It would be counter-productive to put the wrong receiving address on a package, but often the named recipient is not actually associated with the

receiving address. This allows the person receiving the package to claim that they did not know about its contents. Sometimes drug packages are addressed to vacant properties with the expectation that the postal carrier will just leave it at the address. The intended recipient will then retrieve it from that location and hope to remain anonymous.

d. *Location of Sender:* The fact that a package is sent from a narcotics source state such as Arizona, California, Texas, Washington, Colorado, Puerto Rico and Florida (among others) can also indicate that the parcel contains controlled substances.

e. *Smell:* The odor of cocaine, marijuana, and methamphetamine are distinct, and through experience postal inspectors are familiar with these odors. On occasion, a parcel will emit an odor that is easily recognized without the assistance of a canine. Other smells that suggest that a parcel may contain narcotics include the aroma of masking agents. Common masking agents used in an attempt to thwart detection by law enforcement and canines typically include dryer sheets, coffee, mustard, and any other substance that releases a strong smell.

f. *Heavy Taping:* Heavily taped parcels are another factor that will suggest a drug parcel, because narcotics parcels are heavily taped in an effort to keep the smell inside and to forestall easy checking on the interior contents by lifting up a flap. For this reason, your Affiant has also observed excessive glue on the flaps of narcotics parcels as well.

g. *Click-N-Ship:* The US Postal Service created Click-N-Ship as a service for frequent mailers and businesses who prefer printing address labels and purchasing postage from their residence or business. Drug traffickers create Click-N-Ship accounts as a means of giving a legitimate appearance to their drug mailings. They create the accounts using fictitious account information and often provide pre-paid credit cards as a means of payment, which are difficult to track. Drug traffickers often use legitimate business return addresses in states other than California

and Arizona as a means to deter detection, as these other states are not usually considered “source” states for controlled substances. The postage labels are printed/typed, unlike the typical drug related mailing label which is handwritten.

4. It is your Affiant’s experience that when these factors are observed, a drug detection K-9 will likely “alert,” next to the parcel, indicating that the dog has detected the presence of narcotics. As a result, these factors become a reliable way to profile the parcels being shipped every day.

5. The facts contained in this affidavit are based on my personal knowledge as well as that of other law enforcement personnel involved in this investigation. All observations that were not made personally by me were related to me by persons with knowledge. This affidavit contains that information necessary to establish probable cause to support an application for a search warrant. This affidavit is not intended to include each and every fact and matter observed by or made known to agents of the government.

III. Probable Cause

6. The Subject Parcels both bear the following factors or suspicious characteristics associated with illicit content:

<i>Subject Parcel Express or Priority</i>	<i>From Source State:</i>	<i>Weight:</i>	<i>Label:</i>	<i>Senders name associated with address? Yes / No</i>	<i>Recipients name associated with address? Yes / No</i>	<i>Canine Alert?</i>
1. Express	Yes – CA	11 lbs. 10 oz.	Handwritten	No	No	Yes – Riggs ¹

¹ “Riggs” was most recently certified in July 2021, to alert on odors of marijuana (THC), cocaine, crack cocaine, ecstasy (MDMA), methamphetamine, and heroin. “Riggs” is trained on a monthly basis to ensure his

2. Express	Yes – CA	8 lbs. 10 oz.	Handwritten	No	No	Yes - Riggs
3. Express	Yes – CA	4 lbs. 8 oz.	Handwritten	No	No	Yes - Riggs
4. Express	Yes – FL	5 lbs. 9 oz.	Handwritten	Yes	Yes	Yes - Riggs
5. Express	Yes – CA	11 lbs. 9 oz.	Handwritten	No	No	Yes - Riggs
6. Express	Yes – CA	8 lbs. 12 oz.	Handwritten	No	No	Yes - Riggs
7. Express	Yes – CA	11 lbs. 0 oz.	Handwritten	No	Yes	Yes - Riggs
8. Express	Yes – CA	11 lbs. 1 oz.	Handwritten	No	No	Yes - Riggs
9. Express	Yes – CA	5 lbs. 0 oz.	Handwritten	No	No	Yes - Riggs

7. The suspicious characteristics listed above were identified while the Subject Parcels were in the mail stream. On December 14 and 15, 2021, the Subject Parcels listed above were removed and on December 15, 2021, law enforcement used standard protocol for canine detection to determine whether there was probable cause that the Subject Parcels contained narcotics. Specifically, after being removed from the mail stream, the Subject Parcels were individually placed in a secure area next to several other empty and unused boxes. At that time, one narcotic detection canine, “Riggs,” was brought forward to scan the group of boxes, which included the individual subject parcels and the empty and unused boxes placed around the Subject Parcels. The handler observed the canine and then informed inspectors that “Riggs” alerted to the presence of narcotics for the Subject Parcels.

VI. Conclusion

8. Your Affiant submits that based upon the above indicators reflected in the Subject Parcel described herein, based upon my training and experience, and based upon the alert of a

accuracy. Montgomery County Police Department Detective Scott Carson is the handler for “Riggs.”

trained canine on the Subject Parcels, I believe that there is probable cause that the Subject Parcels contain narcotics or controlled substances, or the proceeds thereof (i.e. U.S. currency) and/or materials relating to the distribution of controlled substances through the U.S. Mail.

Miguel Bosch, Jr.

Miguel Bosch Jr.
United States Postal Inspector

This Affidavit was submitted to me by email and attested to me as true and accurate by telephone consistent with Fed.R.Crim.P. 4.1 and 41(d)(3). Subscribed and sworn to before me this 17 th day of December, 2021.

Thomas M. DiGirolamo

The Honorable Thomas M. DiGirolamo
United States Magistrate Judge